



United States
Environmental Protection
Agency

Office of
Solid Waste and
Emergency Response

Publication 9203.1-051
December 1992

Assessing Sites Under SACM — Interim Guidance

Office of Emergency and Remedial Response
Office of Waste Programs Enforcement
Office of Enforcement

Intermittent Bulletin
Volume 1 Number 4

The purpose of the Superfund Accelerated Cleanup Model (SACM) is to make Superfund cleanups more timely and efficient. This will be accomplished through more focus on the front end of the process and better integration of all Superfund program components. The approach involves:

- A continuous process for assessing site-specific conditions and the need for action;
- Cross-program coordination of response planning;
- Prompt risk reduction through early action (removal or remedial);
- Appropriate cleanup of long-term environmental problems;
- Early public notification and participation; and
- Early initiation of enforcement activities.

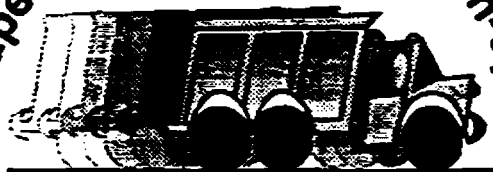
SACM is a process change that should be considered for all Superfund activities. Implementation of this policy will be consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Overall Superfund priorities remain the same: deal with the worst problems first; aggressively pursue enforcement; and involve the public and relevant State agencies at all appropriate stages of the work.

SACM Assessment

Assessing sites under SACM involves the following principles:

- The process integrates traditional site assessment functions to allow continuous assessment for high priority sites that proceeds until all necessary data are collected to screen sites or support any needed response actions. SACM goals include combining activities to support both removal and remedial assessments. The continuing assessment process supports both National Priorities List (NPL) listing and remedial actions.
- Response action decisions should be initiated as soon as evidence indicates that early action is warranted. Any appropriate enforcement actions should be initiated as well. Assessment work can continue concurrently with early actions.
- Assessment procedures are coordinated to ensure that data collected in one phase of assessment support other assessment, enforcement, and response activities.

Superfund Accelerated Clean-up



Faster...Cleaner...Safer

- Sites posing the greatest threat are addressed first ("Worst Sites First"). All sites will be reviewed to determine site priority for continued assessment.

Superfund assessment under SACM integrates previously separate removal and remedial assessments into a single process. Under SACM the assessment processes operate concurrently; specific functions need not be completed before other functions can start. Integrating assessment functions

will cut several years from the assessment and cleanup process. Sites receive the appropriate level of effort needed to make assessment decisions, and sites needing no further action under Superfund are designated as Site Evaluation Accomplished (SEA). Sites assigned an SEA designation are referred to the States or other regulatory authorities for further action, as appropriate. Whenever possible, Superfund assessment activities are conducted concurrently with response and enforcement actions. The basic principles of SACM assessment are built upon the need to eliminate redundancy and expedite the Superfund process.

The SACM assessment approach can screen out a large percentage of potential releases early in the process. Where

it is clear no CERCLA response action will be taken, the assessment is completed by documenting the basis of the decision through an SEA designation. If further data indicate that the site is likely to have a Hazard Ranking System (HRS) score of 28.5 or more, EPA (or the State, under a cooperative agreement) may initiate a Remedial Investigation (RI). Additional data needed to prepare the HRS package can be collected while the RI is underway. RI data can be used to support removal action decisions and HRS scores, as well as remedial action decisions. The Region must include documentation required by the NCP for moving from one phase of assessment to another.

The Regional Decision Team (RDT) is an integral part of the site assessment process. Under SACM, coordination among removal, remedial, and State agency personnel is critical, and fostering that coordination is a role of the RDT. At the point where assessment information is adequate for decision-making, the RDT convenes to consider options for sites. The RDT can then direct or recommend a response action (e.g. time critical removal), decide to collect additional data, develop an enforcement strategy, and recommend placing the site on the NPL.

The States have always played a critical role in site assessment, performing most of the Preliminary Assessments (PA) and many of the Site Investigations (SI). EPA expects that role to continue under SACM. The EPA Regions and the States will coordinate to develop two-way communication concerning Federal and State response actions. EPA Regions are responsible for working out the appropriate arrangement with each of their States.

Coordination of assessment and enforcement activities is also critical. When it is feasible, the site assessment reports should identify owners, operators, and witnesses, with the appropriate documentation. Likewise, they should describe generator records and other useful information, such as drum labels. The decision to start a Potentially Responsible Party (PRP) search requires a balancing of resources. Although many sites (i.e., those designated SEA) will not need PRP searches, rapid action under SACM may require that PRP searches begin early in the process for some sites. As a general rule, PRP search activities should begin as soon as possible after the decision is made that a response action is likely to be required at the site.

Experience has shown that early and frequent communication with local communities can enhance site response, and this will be particularly true under SACM. Where appropriate, EPA and the State should take the initiative in commencing community involvement early in the assessment process. The Agency is developing guidance for community involvement activities at the assessment stage of the process.

Consistent with the NCP, listing sites on the NPL will continue to be a prerequisite to spending remedial action funds to clean up sites. The HRS will continue to be the primary basis for selecting sites for the NPL. SACM does not change the role of the HRS and NPL, and in general SACM should not significantly affect the number of sites that EPA will place on the NPL.

Expediting Cleanup Through SACM Assessment

SACM promotes performing risk assessment and RI activities earlier in the assessment process for a site where data indicate remedial action will be needed. Once a decision has been made to conduct the RI in conjunction with HRS data collection, integrated assessment data collection and sampling efforts continue to:

- Obtain documentation for the HRS; and
- Characterize site sources, extent of contamination, and risks to determine appropriate cleanup actions.

Consistent data collection approaches and appropriate data quality objectives that serve the needs of early action, long-term action, and NPL listing will promote efficiency in Superfund. A single team should collect samples and select analytical methods to serve multiple program needs. A coordinated site mobilization eliminates duplication of tasks and reduces sampling and analyses, saving both time and money.

The scoping and planning of the RI should begin as soon as EPA determines that the site will most likely require remedial action. The RDT may decide to begin an RI at any time during the assessment process. Once RI activities begin, assessment activities continue concurrently to collect sufficient information to determine the site score for possible listing on the NPL. While a site might be designated as SEA during that process, the RDT should select sites for early RIs only where it appears the site will meet the criteria for the NPL. Removal actions can, of course, be taken at any time in the assessment process, and the RDT should consider an early action at any site selected for an early RI.

One key to the success of the SACM approach is to select the appropriate sites for starting the RI prior to HRS scoring. It is important to avoid committing high levels of resources to sites that may not be eligible for the NPL. Some site conditions, in particular where human exposure or contamination of a sensitive environment has been found, clearly indicate that the HRS score will be above 28.5 and that a response action will be needed (see Figure 1). The "NPL-caliber" sites will be a focus of integrated assessments and early actions.

Even where a site appears to warrant an early RI, there is some possibility that the site will not score high enough to be placed on the NPL. EPA recognizes this and is willing to proceed with the RI early in the assessment process to

FIGURE 1: Examples of NPL-caliber Sites

- Public drinking water supplies are contaminated with a hazardous substance.
- Private wells are contaminated with a hazardous substance above a health-based benchmark.
- Soils on school, daycare center, or residential properties are contaminated by a hazardous substance above background levels.
- A hazardous substance is detected above background in an offsite air release in a populated area.
- A highly toxic substance known to bioaccumulate (e.g., PCBs, mercury, dioxin, PAHs) is discharged into surface waters.
- Sensitive environments (e.g., critical habitats for endangered species) are contaminated with a hazardous substance above background levels.

encourage faster response actions at the majority of cases. Moreover, sites with the conditions described above will often meet the criteria for removal actions anyway, and the RI will provide valuable information for any response that is ultimately selected.

In addition to the risk related conditions, the RDT should consider the following when evaluating whether an RI should be initiated at a site:

- Some sites may be excluded from Superfund consideration under policy, regulatory, or legislative restrictions. For instance, EPA policy is to defer from the NPL those facilities subject to corrective action authorities of the Resource Conservation and Recovery Act (RCRA) (see 54 FR 41000, October 4, 1989).
- At sites where receptors have been exposed to hazardous substances, but the source or sources are unknown, the decision to perform an early RI may depend on the nature of the potential sources. For

example, if a RCRA facility is a potential source, an early RI should generally not be performed based on the RCRA deferral policy. However, in most other cases, an early RI may contribute to identifying the source or sources of contamination.

The PRP search and other enforcement actions should indicate whether ensuing site response will be Fund- or PRP-lead, under the policy that enforcement first is the preferred strategy. While the above serve as general guidelines, the RDT will need to evaluate individual cases to determine whether to proceed with an early RI and whether enforcement or the Fund offers the more appropriate course of action.

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NOTICE: The policies set out in this fact sheet are not final Agency action, but are intended solely as guidance. They are not intended, nor can they be relied upon, to create any rights enforceable by any party in litigation with the United States. EPA officials should follow the guidance provided in this fact sheet, or may act at variance with the guidance, based on an analysis of site-specific circumstances. The Agency also reserves the right to change this guidance at any time without public notice.

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This paper is one of five fact sheets published by EPA under publication number 9203.1-051 (Volume 1, Numbers 1-5) to describe the Superfund Accelerated Cleanup Model (SACM) and should be reviewed in conjunction with the other SACM fact sheets. Comments on this document should be directed to Janet Grubbs of the Hazardous Site Evaluation Division (703) 603-8833.

There are two other important sources of information: "SACM concept paper" (8/5/92) and *Guidance on Implementation of the Superfund Accelerated Cleanup Model Under CERCLA and the NCP* [OSWER Directive No. 9203.1-03 (7/7/92)]. General SACM information can be obtained by calling the Superfund Document Center (202) 260-9760.